



## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217)782-3397

BRUCE RAUNER, GOVERNOR

ALEC MESSINA, ACTING DIRECTOR

September 7, 2016

Ms. Sara Breneman  
Chief, Air Enforcement and Compliance Assurance Branch  
United States Environmental Protection Agency  
Region 5  
77 West Jackson Boulevard  
Chicago, IL 60604-3590

Re: Illinois's FFY2017 Alternative Compliance Monitoring Strategy for CAA Stationary Source Program.

Dear Ms. Breneman:

In accordance with the July 2014 Clean Air Act Stationary Source Compliance Monitoring Strategy ("CMS") policy and the Performance Partnership Agreement ("PPA"), the Illinois Environmental Protection Agency (IEPA), Division of Air Pollution Control, Bureau of Air, Field Operations Section is submitting Illinois's Alternative CMS plan for FFY2017.

IEPA will conduct a full compliance evaluation ("FCE") at all Title V major sources at least once every three (3) years and all synthetic minor sources at least once every five (5) years except for those sectors or sources recommended for an alternative evaluation frequencies.

Illinois's Alternative CMS Plan is based on the federal fiscal year (October 1, 2016 – September 30, 2017) consistent with the July 2014 CMS and the PPA. IEPA will continue to work with the EPA to ensure the quality of data and the source universes in ICIS-Air are timely, complete and accurate. IEPA will also continue to meet the minimum data requirements in reporting our compliance and enforcement data to ICIS-Air.

IEPA will continue to conduct FCE's at or beyond the evaluation frequencies required by the July 2014 CAA CMS to address State compliance, enforcement issues, and environmental impacts. For FFY2017, IEPA commits to conduct FCE's at 136 Title V major sources, 10 mega-sites, and 53 synthetic minor sources at or above the 80% threshold of major sources. In addition, 46 FCE's will be conducted at sources that were identified during the alternative plan development.

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595 S. State, Elgin, IL 60123 (847) 608-3131  
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2009 Mall St., Collinsville, IL 62234 (618) 346-5120

9511 Harrison St., Des Plaines, IL 60016 (847) 294-4000  
412 SW Washington St., Suite D, Peoria, IL 61602 (309) 671-3022  
2309 W. Main St., Suite 116, Marion, IL 62959 (618) 993-7200  
100 W. Randolph, Suite 10-300, Chicago, IL 60601

In those years where an FCE is not conducted, partial compliance evaluations will be completed including review of annual compliance certifications, review of quarterly deviation reports, review of emergency occurrence reports, review of various emission reports, review of stack test reports, and review of continuous emission monitoring system (CEMS) and continuous opacity monitoring system (COM) reports.

We look forward to FFY2017 and achieving the goals of the alternative CMS and the PPA. IEPA will also provide EPA with progress reports by July 15, 2017 and at the end of the FFY of the results from the FCE's conducted under the alternative CMS plan.

If you have further questions, please contact me at 217/524-0229.

Sincerely,

A handwritten signature in black ink, appearing to read "Ron Robeen", with a long horizontal flourish extending to the right.

Ron Robeen  
Field Operations Section Manager  
Bureau of Air  
Illinois Environmental Protection Agency

Attachments: Illinois Compliance Monitoring Strategy – Alternative Plan  
A – All major and SM80 sources in Illinois  
B – All permitted sources in Illinois  
C – All sources who received, or are receiving, a FCE in FFY2016  
(supplied during the first year of the Plan (FFY2016)).  
D – All sources receiving a FCE in FFY2017.